

S/N 10/727,240

Response to Office Action Dated 06/26/2006

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**REMARKS**

A review of the claims indicates that:

- A) Claim 18 remains in original form.
- B) Claims 1—17, 19—28 and 32—34 are currently amended.
- C) Claims 29—31 are currently withdrawn.

In view of the following remarks, Applicant respectfully requests reconsideration of the rejected claims and withdrawal of the rejections.

**Amendments to the Specification**

Paragraph [0001] has been amended to reflect the serial numbers and filing dates of two related applications.

**Claim Rejections**

Consistent with the Examiner's request, a number of claims have been amended to recite the phrase underlying the abbreviations PDF and PPML.

**§101 Rejections**

Claims 14, 21, 25 and 32 have been amended to reflect the operation of a processor in performing elements recited by these claims. Accordingly, the Applicant submits that the requirements of Section 101 are fulfilled.

**§103 Rejections**

The independent claims 1, 14, 21, 25, 32 and 33 were rejected under Section 103(a) as being unpatentable over Gebert (US 2002/0111963) in view of PODI (a web-based document). The Applicant respectfully traverses the rejection.

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Traversal of Rejection of Independent Claim 1

Claim 1 recites a processor-readable medium comprising processor-executable instructions for generating a PDF (portable document format) document from a PPML (personalized print markup language) document, the processor-executable instructions comprising instructions for:

- parsing structures within the PPML document;
- **generating a PDF document tree;**
- interpreting the parsed structures from the PPML document onto locations on the PDF document tree; and
- configuring a PDF document according to the PDF document tree.

The Gebert reference fails to disclose PPML to PDF translation. Instead, Gebert discloses a printing system that receives an XML source document as input and creates a plurality of page objects that are rasterized and printed (see FIG. 1 and other locations). Additionally, XML to PDF translation is disclosed (see [0007] lines 5—9).

The Patent Office agrees that Gebert does not teach PPML to PDF translation (see Office Action mailed 06/26/2006, page 5, middle paragraph). The Patent Office suggests that XML to PDF translation is equivalent to PPML to PDF translation (see page 5, first full paragraph). The Patent Office suggests that, “thus, generating a PDF document from an PPML document is interpreted as requiring the same functionalities as generating a PDF from XML.” (See Office Action at page 5, first full paragraph.) The Applicant respectfully disagrees.

The Applicant submits that there is no reference of record to support such a statement. Accordingly, the Applicant submits that the Office should either find such a reference—indicating that the same functionalities are required for generating a PDF with a PPML as an XML input file—or should supply such an

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1 affidavit. In the absence of these alternatives, the Applicant respectfully requests  
2 that the Section 103 rejection be removed, and the claims allowed to issue.

3 The Patent Office suggests that while Gibert does not expressly show  
4 PPML to PDF translation, that PODI does. The Applicant respectfully disagrees.

5 The PODI document fails to teach or suggest PPML to PDF translation.  
6 The PODI document teaches a product called "Argon PPML/PDF" (see logo in the  
7 upper left corner, all slides). Accordingly, PODI teaches the creation of a  
8 PPML/PDF document. Such a document is a PPML document wherein all of the  
9 assets have been converted to PDF (see slides 25—27 particularly). Thus, assets,  
10 such as images in other formats, are all translated to PDF, for inclusion within the  
11 PPML/PDF document. For example, referring to "1." in slide 26, we see that  
12 PPML having exclusive use of PDF is such that "data representation in PPML is  
13 limited to integral PDF files." Thus, what PODI teaches is a PPML document  
14 having PDF assets within its tree structure. Accordingly, PODI does not teach or  
15 suggest translating from PPML to PDF. PODI teaches translating a PPML  
16 document having many different asset types into a PPML document having PDF  
17 assets. In response, the Applicant respectfully requests that the Section 103  
18 rejection be removed, and the claims allowed to issue.

19 Combined, Gebert and PODI would not result in PPML to PDF translation.  
20 Gebert teaches XML to PDF translation, while PODI teaches translating a PPML  
21 document having assets of different types into a PPML document having only  
22 PDF assets. Combining such teachings would not result in the elements recited by  
23 the claim. Accordingly, the Applicant respectfully requests that the Section 103  
24 rejection be removed, and the claims allowed to issue.

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1        Gebert and PODI, singly and in combination, fail to teach or suggest,  
2        “generating a PDF document tree”. Referring to Gebert, it can be seen that Gebert  
3        relies on conventional XML-FO (formatting object) technology to make the  
4        translation. Accordingly, the Gebert reference teaches the use of an XML  
5        formatting tree (see Gebert at [0007] line 19 and [0008] line 5). In particular,  
6        Gebert teaches generating an XML tree at [0007] lines 18—19, wherein Gebert  
7        states:

8  
9        “...generates from the source XML document a result XML tree...”.

10  
11        Accordingly, the Gebert reference does not teach or suggest generation of  
12        a PDF document tree in the translation, as recited. Moreover, the PODI document  
13        does not appear to teach or suggest the use of any type of document tree.  
14        Therefore, Gebert and PODI fail to disclose this element, as recited by Claim 1.  
15        Accordingly, the Applicant respectfully requests that the Section 103 rejection be  
16        removed, and the claims allowed to issue.

17        **Traversal of Rejection of Independent Claims 14, 21, 25, 32 and 33**

18        Claims 14, 21, 25, 32 and 33 recite PPML to PDF translation generally, and  
19        specifically recite generation of a PDF document tree. Accordingly, these claims  
20        are allowable for at least the same reasons that Claim 1 is allowable.

21        **Traversal of Rejection of Dependent Claims**

22        Claims 2—13, 15—20, 22—24, 26—31 and 34 depend from Claims 1, 14,  
23        21, 25, 32 and 33. These claims are allowable due to their dependence from an  
24        allowable base claim. These claims are also allowable for their own recited  
25

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1 features that, in combination with those recited in the associated independent  
2 claim, are neither disclosed nor suggested in references of record, either singly or  
3 in combination with one another.

#### 4 Conclusion

5 The arguments presented above are intended to present the Applicant's  
6 position clearly, but should not be considered exhaustive. Accordingly, the  
7 Applicant reserves the right to present additional arguments to clarify the  
8 Applicant's position further. Moreover, the Applicant reserves the right to  
9 challenge the status as prior art of one or more documents cited in the Office  
10 Action.

11 The Applicant submits that the claims as presented are in condition for  
12 allowance. Accordingly, the Applicant respectfully requests that a Notice of  
13 Allowability be issued. If the Patent Office's next anticipated action is not the  
14 issuance of a Notice of Allowability, the Applicant respectfully requests that the  
15 undersigned attorney be contacted to schedule an interview.

16 Respectfully Submitted,

17  
18 Dated: 16 Nov 2006

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